

FW: Deposition schedule Teal Peak case

Antonio A. Arias <Aaa@mcvpr.com>

Fri 4/8/2022 2:51 PM

To: Alan Goldman <goldiefun@msn.com>

Cc: José Irizarry Castro <jic@mcvpr.com>

Dear Mr. Goldman: It was great to speak with you yesterday. As I had anticipated, I had a telephone conference with attorney Sánchez this morning to set a tentative deposition schedule. Mrs. Grzan will not testify, has no personal knowledge of the case and hence we'll not take her deposition. Your deposition is tentatively scheduled for May 19<sup>th</sup>. Since you cannot travel, I recommend that I travel to Vermont to prep you and sit at your side to defend the deposition, then return to San Juan to take Mr. Grzan's deposition May 23<sup>rd</sup>. I assume there is a lawyer's office in Montpelier that can accommodate us the day of your deposition. I have a status conference with Judge Delgado on May 6<sup>th</sup> at 4:00 p.m. by videoconference and the discovery conclusion deadline is May 31<sup>st</sup>, 2022. Thanks for you taking care of the invoices for our services. I'll confirm when we receive the check. I trust your upcoming tests are uneventful.



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**From:** Antonio A. Arias

**Sent:** Friday, April 8, 2022 12:08 PM

**To:** asanchez@sbsmnlaw.com

**Subject:** Deposition schedule Teal Peak case

Greetings Adrián: Pleasure talking to you this morning to coordinate a schedule to take the depositions in our case. As we discussed the schedule is as follows:

1. Tuesday May 3<sup>rd</sup>, 2022, 10:00 a.m. at McConnell Valdés Gerald Kleis. I will call his attorney for his availability and need to subpoena for his deposition appearance.
2. Thursday May 5<sup>th</sup>, 2022, 10:00 a.m. at McConnell Valdés Yarinail Donato. You and I will doublecheck her contact information in the documents and I will call her to verify her availability and need to subpoena her.
3. Tuesday May 9<sup>th</sup>, 2022, 10:00 a.m. at McConnell Valdés Adam Long. You'll verify his current address and contact information for me to subpoena him for his deposition appearance.
4. Wednesday May 11<sup>th</sup>, 2022, 10:00 a.m. at McConnell Valdés Notary Public Miguel Carbonell. You'll call him to verify availability and need to subpoena him.
5. Thursday May 19<sup>th</sup>, 2022, 10:00 a.m. by videoconference Alan Goldman.
6. Monday May 23<sup>rd</sup>, 2022, 10:00 a.m. at McConnell Valdés John Michael Grzan.

We agreed to speak Monday April 18<sup>th</sup> to discuss final availability and need to subpoena witnesses.

We'll be in good shape to inform the court of our arrangements at the next status conference with Judge Delgado May 6<sup>th</sup> at 4:00 p.m.